

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

TRUE THE VOTE,

Movant-Intervenor.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

JOHN STEEN, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

### **DECLARATION OF FLOYD CARRIER**

Pursuant to 28 U.S.C. § 1746, I, Floyd Carrier, declare as follows:

1. My name is Floyd James Carrier and I am one of the Plaintiffs in this case. I am an African-American.
2. I reside in China, Texas, which is located in Jefferson County.
3. I am a veteran who received an honorable discharge from the Armed Forces.
4. I was born in 1931.
5. I am bound to a wheel chair because of a disability.
6. I have routinely voted at the same location for about 40 years without incident. The usual procedure for me to vote in the past has been that the person accompanying me would go into the polling location and present my voter registration card. A poll worker would then bring a mobile voting device out to me in the automobile that had carried me to the polls. I then would vote on the mobile voting device. My identity is known to the poll workers there (they call me by name when they see me). The population of China, Texas is about 1100 persons.
7. On November 5, 2013, my son drove me to vote at my County precinct barn in China, Texas. The poll official inside was presented with my expired Texas driver's license, a Medicare card and a veteran identification card (which does not bear my photo). The poll workers knew me by name but would not come out to the car to let me vote because my identification was not acceptable under the law. I was not offered a provisional ballot of any type.
8. The poll workers refused to accept any of the forms of identification I had with me and I was told that I could not vote.
9. I was denied the right to vote in the November 5, 2013 elections as a direct result of SB 14, the photo ID law.
10. I have been attempting to obtain a Texas ID since the death of my wife in January 2013. In February 2013, I went to the Texas Department of Public Safety in

Beaumont, Texas to obtain a valid identification card. Although, I had in my possession an expired state issued driver's license, I was told that I needed a birth certificate.

11. I am the oldest living relative in my family and I was not born in a hospital but at home in a rural area. My son visited the Courthouse of each county surrounding my place of birth and no records were present concerning my birth.
12. I submitted an application to the Texas Department of State Health Services for a birth certificate. After twelve weeks, I received a birth certificate from the state. The birth record the agency sent me had my name misspelled. The DPS would not accept this birth record because of the inaccuracies in the name.
13. I again applied for an amended birth certificate around June of 2013. With the application I submitted an affidavit from a younger sibling and certified DD214 Army discharge documents along with the required fee.
14. The application for an amendment was returned to me unapproved, approximately two months ago. My son and I have attempted on several occasions to contact the state agency to resolve the matter but our phone calls have gone unreturned, to date I have diligently sought to obtain a birth certificate from the State of Texas. Although, I have been a lifelong resident, a member of the Armed Services and had been gainfully employed for at least 55 years but have not been issued a state approved identification which I was informed was necessary for me to cast my vote in any election in the State of Texas.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 20<sup>th</sup> day of November, 2013.

FLOYD J. CARRIER  
Floyd James Carrier